

## **REMARKS/ARGUMENTS**

### **1.) Claim Amendments**

Claims 1-24 are pending in the application. The Applicants have not amended the claims. Favorable reconsideration of the application is respectfully requested in view of the following remarks.

### **2.) Claim Rejections – 35 U.S.C. § 102(e)**

The Examiner rejected claims 1-3, 7-11, 15-17, 19-20, and 23 under 35 U.S.C. § 102(e) as being anticipated by Watson, *et al.* (US 7,246,166 B1). The Applicants respectfully disagree and request reconsideration of the pending claims for the reasons discussed below.

The Examiner cites Col. 4, lines 50-60 and FIG. 4 of Watson for showing the essential features of the rejected claims, particularly independent claims 1, 9, 16, and 23. However, key limitations recited in the Applicants' claims appear to be missing from Watson. Watson does seem to show allocating a port number to User A (a private domain node that initiates a connection request), but does not seem to show centrally allocating, in response to the connection request, a public-domain gateway address from a pool of gateway addresses and an inside node port number for the private-domain node, wherein the step of centrally allocating comprises the step of identifying, based on predetermined connection information derivable from the configuration request, a public-domain gateway address and an inside node port number that in combination with the predetermined connection information define a public-domain gateway state representation that has no counterpart in any existing gateway connection state.

Watson is directed to a method of setting up a communication path between two entities in the same (private) address domain. Watson retains private address information for User A when the call setup message is routed through the public address domain and back to User B. A direct communication path can then be set up between User B and User A without being routed back through the public address

domain. It is certainly not clear whether any of the NATs shown in Watson are performing the claimed steps.

The Applicants' independent claims 1, 9, 16, and 23 are quite detailed and specific about how the central allocation of the public-domain gateway address and the private-domain port number is performed. A number of these steps are not disclosed or suggested by Watson. For example, there is no disclosure whatsoever about the central allocation of a private-domain node port number. Watson only discloses that the NAT1 creates a binding between User A and an address x of a port on the NAT1, where address x is an address within domain D2 (i.e., the **public** domain). This allocation of a **public-domain** port is not what is claimed by the Applicants and does not solve one of the key problems solved by the Applicants' invention.

In prior art systems, when a private-domain node such as User A in Watson initiates a connection request to a NAT, the private-domain node selects, randomly and independently of other private-domain nodes, a private-domain port number for communication with the public-domain. The problem with this approach is that two private-domain nodes with the same allocated public-domain address may select the same private-domain port number for communication with the public domain, thus causing a collision. This problem is discussed in more detail in the Applicants' specification on page 6. The Applicants' claimed invention solves this problem by centrally allocating private-domain port numbers together with public-domain addresses.

This process is not taught or suggested by Watson, and is recited in each of independent claims 1, 9, 16, and 23. Therefore, the allowance of claims 1, 9, 16, and 23 is respectfully requested.

Claims 2, 3, 7, 8, 10, 11, 15, 17, 19, and 20 depend from independent claims 1, 9, or 16 and recite further limitations in combination with the novel elements of claims 1, 9, and 16. Therefore, the allowance of claims 2, 3, 7, 8, 10, 11, 15, 17, 19, and 20 is respectfully requested.

### 3.) Claim Rejections – 35 U.S.C. § 103(a)

The Examiner rejected claims 4-6, 12-14, and 24 under 35 U.S.C. § 103(a) as being unpatentable over Watson, *et al.* (US 7,246,166 B1) in view of Alkhatib, *et al.* (US

2002/0184390 A1). The Applicants respectfully disagree and request reconsideration of the pending claims for the reasons discussed below.

Alkhatib is cited for showing various details of dependent claims 4-6 and 12-14 and of independent claim 24. However, like Watson, Alkhatib also fails to disclose or suggest centrally allocating a combination of a public-domain gateway address and a private-domain node port number, and thus the combination of Watson and Alkhatib does not establish a *prima facie* case of obviousness as required by MPEP 2143.

This feature is recited in independent claims 1, 9, and 24. Claims 4-6 and 12-14 depend from independent claims 1 and 9, respectively. Thus, the allowance of claims 4-6, 12-14, and 24 is respectfully requested.

#### **4.) Conclusion**

In view of the foregoing remarks, the Applicants believe all of the claims currently pending in the Application to be in condition for allowance. The Applicants, therefore, respectfully request that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 1-24.

The Applicants request a telephone interview if the Examiner has any questions or requires any additional information that would expedite the prosecution of the Application.

Respectfully submitted,

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